

**United States Bankruptcy Court  
Northern District of Illinois, Eastern Division**

IN RE: Angelene C Pair	)	Chapter 13
	)	Case No. 16 B 22254
Debtor(s)	)	Judge A. Benjamin Goldgar

**Notice of Motion/Certificate of Service**

Angelene C Pair  
479 Deer Trail Rd  
Chicago Heights, IL 60411

Debtor Attorney: Cutler & Associates Ltd  
via Clerk's ECF noticing procedures

On August 16, 2016 at 10:00 am, I will appear at the location listed to the right, and present this motion, a copy which is hereby served upon you.

> Dirksen Federal Building  
> 219 South Dearborn  
> Courtroom 642  
> Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Friday, August 5, 2016.

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE

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**Objection to Discharge**

Comes now Marilyn O. Marshall, Standing Trustee, and requests that the Court enter an Order denying the debtor's discharge pursuant to 11 U.S.C. § 1328(f) and Rule 4004, and in support thereof respectfully states the following:

1. Debtor filed for Chapter 13 relief on July 11, 2016.
2. Previous to the case at bar the following case was filed:

<u>Case Number</u>	<u>Debtor Name</u>	<u>Filed Date</u>	<u>Discharged Date</u>
1:14-bk-26483	Pair, Angelene (db)	07/18/2014	11/10/2014

3. Debtor received a discharge in the Chapter 7 case that was filed within 4 years of the filing of the present case.
4. Because the debtor received a discharge in a case filed within the preceding time frame, the debtor is not entitled to a discharge in this case.

WHEREFORE, the Trustee prays that this Court enter an Order denying the debtor's discharge, and for any and all other relief this Court deems just and proper.

Office of the Chapter 13 Trustee  
224 S Michigan Ave  
Ste 800  
Chicago, IL 60604  
(312) 431-1300

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE